1 2 3 4 5 6 7 8 9	Robert D. Mitchell (admitted pro hac vice) William M. Fischbach III (admitted pro hac vice) Fletcher R. Carpenter (admitted pro hac vice) Jason C. Kolbe, Nevada Bar No. 11624 Kevin S. Soderstrom, Nevada Bar No. 10235 THEFANY&BOSCO Camelback Esplanade II, Seventh Floor 2525 East Camelback Road Phoenix, Arizona 85016-4229 Telephone: (602) 255-6000 Fax: (602) 255-0103 E-mails: rdm@tblaw.com; wmf@tblaw.com; frc@tblaw.com; jck@tblaw.com; kss@tblaw.com Counsel for Defendant/Counterclaimant Martin	<u>om</u>
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12	UNITED STATES DISTRICT COURT	
13	DISTRICT OF NEVADA	
14	TEST A INC a Delaware comparation	Case No. 3:18-cv-00296-LRH-CBC
15	TESLA, INC., a Delaware corporation,	DEFENDANT/COUNTERCLAIMANT
16	Plaintiff,	MARTIN TRIPP'S MOTION TO SEAL
17	VS.	NOTICE OF THIRD-PARTY DEPOSITION OF ELON MUSK
18	MARTIN TRIPP, an individual,	
19	Defendant.	
20		
21	MARTIN TRIPP, an individual,	
22	Counterclaimant,	
23	Counterclainiant,	
24	TESLA, INC., a Delaware corporation,	
25	,, 	
26	Counterdefendant	
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28	1	

Defendant/Counterclaimant Martin Tripp moves to seal his Notice of Third-Party Deposition of Elon Musk ("Notice") [ECF No. 143] filed contemporaneously with this motion. Pursuant to the October 10, 2018 Protective Order in this case [ECF No. 43] and the Court's December 13, 2019 order [ECF No. 126], the Notice shall be filed under seal due to its confidential nature and the sensitive information contained therein. Tripp therefore requests that the Court grant this motion to seal. DATED this 30th day of January, 2020. TIFFANY & BOSCO, P.A. By Robert D. Mitchell William M. Fischbach III Camelback Esplanade II, Seventh Floor 2525 East Camelback Road Phoenix, Arizona 85016-4229 Counsel for Defendant/Counterclaimant

1 **PROOF OF SERVICE** 2 I am employed in the County of Maricopa, State of Arizona. I am over the age of 18 3 and not a party to the within action; my business address is Tiffany & Bosco, P.A. 2525 E. 4 Camelback Road, Suite 700, Phoenix, Arizona 85016. 5 On January 30, 2020, I served the following described as: DEFENDANT/COUNTERCLAIMANT MARTIN TRIPP'S MOTION TO 6 SEAL NOTICE OF THIRD-PARTY DEPOSITION OF ELON MUSK 7 on the following interested parties in this action: 8 Rory T. Kay Michael Lifrak 9 MCDONALD CARANO LLP Jeanine M. Zalduendo 2300 West Sahara Avenue, Suite Alex Bergjans 10 **Aubrey Jones** 1200 QUINN EMANUEL URQUHART & Las Vegas, Nevada 89102 11 rkay@mcdonaldcarano.com SULLIVAN, LLP 12 865 S. Figueroa Street, 10th Floor Attorneys for Los Angeles, California 90017 Plaintiff/Counterdefendant Tesla, Inc. **13** michaellifrak@quinnemanuel.com 14 jeaninezalduendo@quinnemanuel.com Alex Spiro **QUINN EMANUEL URQUHART** alexbergjans@quinnemanuel.com 15 & SULLIVAN, LLP aubreviones@quinnemanuel.com 51 Madison Avenue, 22nd Floor **16** Attorney for Plaintiff/Counterdefendant New York, New York 10010 Tesla, Inc. 17 alexspiro@quinnemanuel.com Attorney for 18 Plaintiff/Counterdefendant Tesla, Inc. 19 [X] (BY E-MAIL) By transmitting the above documents to the above e-mail addresses. 20 [X] (STATE) I declare under penalty of perjury under the laws of the United States of 21 America that the foregoing is true and correct. 22 EXECUTED on this 30th day of January, 2020 at Phoenix, Arizona. 23 24 /s/ Kaleigh Stilchen 25 **26** 27

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